

REMARKS / DISCUSSION OF ISSUES

Claims 1-20 are pending in the application; claims 7-20 are newly added.

The applicants thank the Examiner for acknowledging the claim for priority and receipt of certified copies of all the priority documents, and for advising that the drawings are acceptable.

Claims are amended for non-statutory reasons: to correct one or more informalities, remove figure label numbers, and/or to replace European-style claim phraseology with American-style claim language. The claims are not narrowed in scope and no new matter is added.

The Office action rejects claims 1-4 and 6 under 35 U.S.C. 102(b) over Shin (WO 01/39239). The applicants respectfully traverse this rejection.

The Examiner's attention is requested to MPEP 2131, wherein it is stated:

"A claim is anticipated only if **each and every element** as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). "The **identical invention** must be shown in as **complete detail** as is contained in the ... claim." *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989).

Claim 1, upon which claims 2-10 depend, claims a plasma picture screen that includes a powder layer between electrode arrays on a front plate and electrode arrays on a carrier plate.

Shin fails to teach a powder layer between electrode arrays on a front plate and electrode arrays on a carrier plate.

The Office action asserts that Shin's layer 10 corresponds to the applicants' claimed powder layer between electrode arrays on a front plate and electrode arrays on a carrier plate. The applicants respectfully traverse this rejection. Shin teaches that layer 10 is a UV-emitting phosphor film. Shin does not teach that this phosphor film is in powder form. The advantages of providing a powder layer are detailed at page 2, line 14 through page 3, line 13.

Further, Shin does not teach that the layer 10 is situated between the electrodes on a front plate and electrodes on a carrier plate. As noted in the applicants' specification, situating the powder layer between the electrodes on opposing plates advantageously affects the capacitance between the electrodes. Shin's FIGs. 2a-2c and 3 clearly indicate that the phosphor film 10 is offset from the electrodes 2 on the front plate 1, and none of Shin's figures indicate that film 10 is situated between the electrodes 2 on the front plate 1 and the electrodes on the lower plate 8.

Because Shin fails to teach a powder layer that is situated between electrodes on a front plate and electrodes on a carrier plate, as specifically claimed in claim 1, the applicants respectfully maintains that the rejection of claims 1-4 and 6 under 35 U.S.C. 102(b) over Shin is unfounded, per MPEP 2131.

The Office action rejects claim 5 under 35 U.S.C. 103(a) over Shin and Takagi et al. (JP 2000-113824). The applicants respectfully traverse this rejection.

MPEP 2142 states:

"To establish a *prima facie* case of obviousness ... the prior art reference (or references when combined) **must teach or suggest all the claim limitations**... If the examiner does not produce a *prima facie* case, the applicant is under no obligation to submit evidence of nonobviousness."

Claim 5 is dependent upon claim 1. In this rejection, the Office action relies upon Shin for teaching the elements of claim 1.

As noted above, Shin fails to teach the elements of claim 1. As such, the applicants respectfully maintain that the rejection of claim 5 under 35 U.S.C. 103(a) that relies upon Shin for teaching these elements is unfounded, per MPEP 2142.

In view of the foregoing, the applicants respectfully request that the Examiner withdraw the rejections of record, allow all the pending claims, and find the application to be in condition for allowance. If any points remain in issue that may best be resolved through a personal or telephonic interview, the Examiner is respectfully requested to contact the undersigned at the telephone number listed below.

Respectfully submitted,



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